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May 15, 1995

VIA HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. - Room 222
Washington, D.C. 20554

Re: IC Docket No. 94-31

RECEIVED
MAY 15 1995
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Dear Mr. Caton:

Attached are an original and seven (7) copies of "Motion for Acceptance of Late-Filed Further Reply Comments" on the Second Notice of Inquiry in the above cited Docket. The Commission is urged to take these late Further Reply Comments into account as it proceeds with its final preparations of U.S. proposals and positions for WRC-95.

If there are any questions, please call the undersigned at (703) 812-0480 or fax at (703) 812-0486.

Respectfully submitted,

FLETCHER, HEALD & HILDRETH, P.L.C.

Leonard Robert Raish

Leonard Robert Raish

On behalf of Parties Involved*

LRR:cej
Enclosures

*See footnote on page 1 of the attached filing for list of parties involved.

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ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

MAY 15 1995

In the Matter of)
)
Preparation for International)
Telecommunication Union World)
Radiocommunication Conferences)

IC Docket No. 94-31

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

MOTION FOR ACCEPTANCE OF
LATE-FILED FURTHER REPLY COMMENTS

Alcatel Network Systems Inc., the American Petroleum Institute (API), the Associated Public Safety Communications Officials, the Association of American Railroads, AT&T Corp., Harris Corporation - Farinon Division, Fixed Point-to-Point Communications Section, Network Equipment Division of the Telecommunications Industry Association, and UTC, The Telecommunications Association (collectively, "Terrestrial Mixed Microwave Services Manufacturers and Users" or "FS Interests"), by the undersigned attorneys and pursuant to Sections 1.3 and 1.415 of the Commission's rules, 47 C.F.R. §§ 1.3 and 1.415, hereby request leave to submit late-filed Further Reply Comments in connection with the Commission's Second Notice of Inquiry in the above-captioned proceeding. In support of their request, FS Interests state as follows:

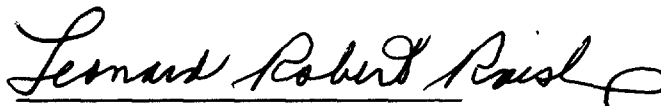
The FS Interests are made up of Terrestrial Mixed Microwave Service users and equipment manufacturers each of whom has earlier participated in the above-captioned proceeding through the submission of timely filed Comments and/or Reply Comments. Since the submission of these filings, FS Interests have had intensive discussions with Non-Geostationary Mobile Satellite Service Interests ("NGSO MSS Interests") designed to

resolve their differences regarding the sharing of the upper 6, 11 and 18 GHz bands. These discussions included several industry meetings and culminated with a meeting by and among FS Interests, NGSO MSS Interests and the Commission's staff on May 12, 1995.

At the May 12 meeting, FS Interests committed themselves to finding a workable solution that can assist the Commission in the completion of its preparations for WRC-95 under IC Docket 94-31. In this connection, they distributed a document outlining compromises they are willing to make to accommodate NGSO MSS Interests. It was agreed that FS users would submit this document in the form of late-filed Further Reply Comments in that docket. The attached Late-Filed Further Reply Comments are hereby submitted pursuant to that agreement.

WHEREFORE, FS Interests respectfully urge the Commission to accept the attached Late Filed Further Reply Comments in the above-captioned proceeding.

RESPECTFULLY SUBMITTED,

A handwritten signature in cursive script, reading "Leonard Robert Raish".

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FOR FS INTERESTS

May 15, 1995

CERTIFICATE OF SERVICE

I, Chellestine Johnson, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C., do hereby certify that copies of the foregoing "Motion for Acceptance of Late-Filed Further Reply Comments" were sent this 15th day of May, 1995, by hand delivery and first-class United States mail, postage prepaid, to:

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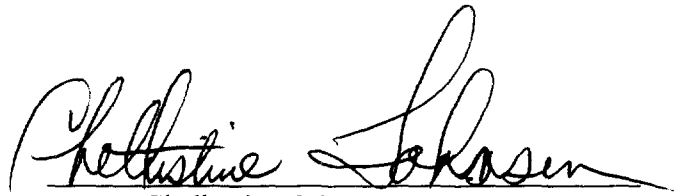
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